

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT - WI
FILED

UNITED STATES OF AMERICA,

2022 APR 19 A 11:53

Plaintiff,

v.

CASE NUMBER
Case No. 22-CR-**22-CR-85**

DEANDRE L. RODGERS and
VIRIDIANA GARCIA-RAMIREZ,

Defendants.

[21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), and
841(b)(1)(B); 18 U.S.C. §§ 2(a), 2(b), 371,
922(a)(1)(A), 922(a)(6), 922(g)(1),
924(a)(1)(D), 924(a)(2), and 924(c)(1)(A)]

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. Beginning on or about December 19, 2021, and continuing until on or about April 5, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**DEANDRE L. RODGERS and
VIRIDIANA GARCIA-RAMIREZ**

knowingly and willfully conspired with each other and others, known and unknown to the Grand Jury, to commit offenses against the United States, namely:

- (a) to knowingly make a false statement in connection with the acquisition and attempted acquisition of any firearm and ammunition from a licensed dealer intended and likely to deceive such dealer of a fact material to the lawfulness of the sale and other disposition of such firearm and ammunition, in violation of Title 18, United States Code, Section 922(a)(6).
- (b) to willfully engage in the business of dealing in firearms, and to transport and receive any firearm in interstate and foreign commerce in the course of such business without a license, in violation of Title 18, United States Code, Section 922(a)(1)(A).
- (c) to knowingly transport and receive in interstate and foreign commerce any firearm, which has had the manufacturer's serial number removed, obliterated, and altered, and to knowingly possess and receive any firearm

which has had the manufacturer's serial number removed, obliterated, and altered and has, at any time, been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(k).

- (d) to knowingly sell and otherwise dispose of a firearm to a prohibited person, in violation of Title 18, United States Code, Section 922(d)(1).
- (e) to knowingly possess a firearm by a prohibited person, in violation of Title 18, United States Code, Sections 922(g)(1) and 2(a).

2. To further the conspiracy, the conspirators committed acts in the Eastern District of Wisconsin, including:

- (a) On or about December 19, 2021, VIRIDIANA GARCIA-RAMIREZ made a false statement intended and likely to deceive Dunham's Sports, a licensed dealer in Racine, Wisconsin, with respect to a fact material to the lawfulness of the sale and disposition of a Taurus International Model G2C 9mm pistol bearing serial number ACC726964 and a Glock Model 43 9mm pistol bearing serial number AFYZ003.
- (b) On or about December 24, 2021, VIRIDIANA GARCIA-RAMIREZ made a false statement intended and likely to deceive Dunham's Sports, a licensed dealer in Racine, Wisconsin, with respect to a fact material to the lawfulness of the sale and disposition of a Taurus Model G3C 9mm pistol bearing serial number ACK399523.
- (c) On or about December 30, 2021, VIRIDIANA GARCIA-RAMIREZ made a false statement intended and likely to deceive Dunham's Sports, a licensed dealer in Racine, Wisconsin, with respect to a fact material to the lawfulness of the sale and disposition of a GSG/Blue Line Solutions LLC Model GSG-16 .22 rifle bearing serial number B106993.
- (d) On or about January 16, 2022, VIRIDIANA GARCIA-RAMIREZ made a false statement intended and likely to deceive Dunham's Sports, a licensed dealer in Racine, Wisconsin, with respect to a fact material to the lawfulness of the sale and disposition of an ACP Philippines/AP International-Pahrump NV Model 206 .38 special revolver bearing serial number RIA2339226.
- (e) On or about January 21, 2022, VIRIDIANA GARCIA-RAMIREZ made a false statement intended and likely to deceive Dunham's Sports, a licensed dealer in Racine, Wisconsin, with respect to a fact material to the lawfulness of the sale and disposition of a Taurus Armas/Taurus International Model 856 .38 special revolver bearing serial number ACK414488.

- (f) On or about January 30, 2022, VIRIDIANA GARCIA-RAMIREZ made a false statement intended and likely to deceive Dunham's Sports, a licensed dealer in Racine, Wisconsin, with respect to a fact material to the lawfulness of the sale and disposition of a Ruger Model LCP .380 caliber auto pistol bearing serial number 379035490.
- (g) On or about February 11, 2022, VIRIDIANA GARCIA-RAMIREZ made a false statement intended and likely to deceive Dunham's Sports, a licensed dealer in Racine, Wisconsin, with respect to a fact material to the lawfulness of the sale and disposition of a Taurus Armas/Taurus International Model 856 .38 special revolver bearing serial number ACK450181.
- (h) On or about February 24, 2022, VIRIDIANA GARCIA-RAMIREZ made a false statement intended and likely to deceive Dunham's Sports, a licensed dealer in Racine, Wisconsin, with respect to a fact material to the lawfulness of the sale and disposition of a Smith & Wesson M&P9 Shield M2.0 9mm pistol bearing serial number JNW8532.
- (i) On or about March 15, 2022, VIRIDIANA GARCIA-RAMIREZ made a false statement intended and likely to deceive Paladin Protection Armory, a licensed dealer in Kenosha, Wisconsin, with respect to a fact material to the lawfulness of the sale and disposition of a Glock Model 26 9mm pistol bearing serial number BWHW613.
- (j) Between March 17, 2022, and March 26, 2022, DEANDRE RODGERS sent photographs to another person of a Glock 26 pistol and a Smith & Wesson M&P Shield 9mm pistol.
- (k) On or about March 29, 2022, VIRIDIANA GARCIA-RAMIREZ made a false statement intended and likely to deceive Paladin Protection Armory, a licensed dealer in Kenosha, Wisconsin, with respect to a fact material to the lawfulness of the sale and disposition of a Glock Model 27 .40 caliber pistol bearing serial number BWEL646.
- (l) On or about March 30, 2022, VIRIDIANA GARCIA-RAMIREZ made a false statement intended and likely to deceive Dunham's Sports, a licensed dealer in Franklin, Wisconsin, with respect to a fact material to the lawfulness of the sale and disposition of a Smith & Wesson M&P9 Shield M2.0 9mm pistol bearing serial number JNV3985.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

Beginning on or about December 19, 2021, and continuing until on or about April 5, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**DEANDRE L. RODGERS and
VIRIDIANA GARCIA-RAMIREZ,**

not being licensed importers, licensed manufacturers, and licensed dealers, did willfully engage in the business of dealing in firearms, and in the course of such business did ship, transport, and receive firearms in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(1)(D), and 2(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 19, 2021, in the State and Eastern District of Wisconsin,

**DEANDRE L. RODGERS and
VIRIDIANA GARCIA-RAMIREZ,**

in connection with the acquisition of a firearm from Dunham's Sports, a federally licensed firearms dealer, in Racine, Wisconsin, knowingly made a false statement intended and likely to deceive the federally licensed firearms dealer with respect to a fact material to the lawfulness of the sale and disposition of such firearm.

2. In connection with the acquisition of firearms, namely, a Taurus International Model G2C 9mm pistol bearing serial number ACC726964 and a Glock Model 43 9mm pistol bearing serial number AFYZ003, VIRIDIANA GARCIA-RAMIREZ falsely stated on a Firearms Transaction Record (U.S. Department of Justice and Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473) that she was the actual transferee/buyer of the firearm, when, in fact, she was not.

All in violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Between on or about December 19, 2021, and on or about December 29, 2021, in the State and Eastern District of Wisconsin,

DEANDRE L. RODGERS,

knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is more fully described as a Glock Model 43 9mm pistol bearing serial number AFYZ003.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 24, 2021, in the State and Eastern District of Wisconsin,

**DEANDRE L. RODGERS and
VIRIDIANA GARCIA-RAMIREZ,**

in connection with the acquisition of a firearm from Dunham's Sports, a federally licensed firearms dealer, in Racine, Wisconsin, knowingly made a false statement intended and likely to deceive the federally licensed firearms dealer with respect to a fact material to the lawfulness of the sale and disposition of such firearm.

2. In connection with the acquisition of a firearm, namely, a Taurus Model G3C 9mm pistol bearing serial number ACK399523, VIRIDIANA GARCIA-RAMIREZ falsely stated on a Firearms Transaction Record (U.S. Department of Justice and Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473) that she was the actual transferee/buyer of the firearm, when, in fact, she was not.

All in violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2(a).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about January 30, 2022, in the State and Eastern District of Wisconsin,

**DEANDRE L. RODGERS and
VIRIDIANA GARCIA-RAMIREZ,**

in connection with the acquisition of a firearm from Dunham's Sports, a federally licensed firearms dealer, in Racine, Wisconsin, knowingly made a false statement intended and likely to deceive the federally licensed firearms dealer with respect to a fact material to the lawfulness of the sale and disposition of such firearm.

2. In connection with the acquisition of a firearm, namely, a Ruger Model LCP .380 caliber auto pistol bearing serial number 379035490, VIRIDIANA GARCIA-RAMIREZ falsely stated on a Firearms Transaction Record (U.S. Department of Justice and Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473) that she was the actual transferee/buyer of the firearm, when, in fact, she was not.

All in violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2(a).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about February 8, 2022, in the State and Eastern District of Wisconsin,

DEANDRE L. RODGERS

knowingly and intentionally distributed a controlled substance.

2. The offense involved 50 grams and more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 8, 2022, in the State and Eastern District of Wisconsin,

DEANDRE L. RODGERS

knowingly used, carried, and brandished a firearm during and in relation to the drug trafficking crime charged in Count Seven of this Indictment, and possessed a firearm in furtherance thereof.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 924(c)(1)(A)(ii).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about March 2, 2022, in the State and Eastern District of Wisconsin,

DEANDRE L. RODGERS

knowingly and intentionally distributed a controlled substance.

2. The offense involved 50 grams and more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 2, 2022, in the State and Eastern District of Wisconsin,

DEANDRE L. RODGERS

knowingly used, carried, and brandished a firearm during and in relation to the drug trafficking crime charged in Count Nine of this Indictment, and possessed a firearm in furtherance thereof.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 924(c)(1)(A)(ii).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Between on or about April 2, 2022, and on or about April 5, 2022, in the State and Eastern District of Wisconsin,

**DEANDRE L. RODGERS and
VIRIDIANA GARCIA-RAMIREZ**

knowingly and intentionally possessed with intent to distribute a controlled substance.

2. The offense involved 28 grams and more of a mixture and substance containing cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), Title 18, United States Code, Section 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

FORFEITURE NOTICE

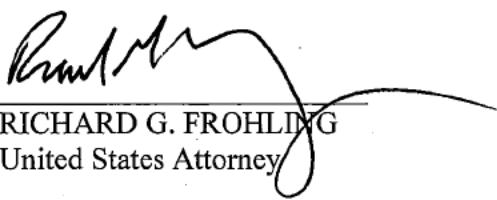
1. Upon conviction of the controlled substance offense or offenses set forth in Counts Seven, Nine, or Eleven of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violation, and any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violation, including but not limited to: \$800 in United States currency seized from 1149 Oakes Road, Racine, Wisconsin, and a personal money judgment in an unspecified amount, representing the amount of unseized proceeds obtained as a result of the controlled substance offense or offenses.
2. If any of the property described above, as a result of any act or omission by the defendant, cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third person, has been placed beyond the jurisdiction of the Court, has been substantially diminished in value, or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p).
3. Upon conviction of the firearms offense or offenses set forth in Counts Two, Three, Four, Five, Six, Eight, or Ten of this Indictment, the defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition, involved in the offense of conviction, including but not limited to: a Taurus International Model G2C 9mm pistol bearing serial number ACC726964, a Glock Model 43 9mm pistol bearing serial number AFYZ003, a Taurus Model G3C 9mm pistol bearing serial number ACK399523, and a Ruger Model LCP .380 caliber auto pistol bearing serial number 379035490.

A TRUE BILL.

[REDACTED]
FOREPERSON

Dated:

4/19/2022


RICHARD G. FROHLING
United States Attorney